

Message

From: Segall, Martha [Segall.Martha@epa.gov]
Sent: 10/17/2018 4:58:46 PM
To: Lischinsky, Robert [Lischinsky.Robert@epa.gov]
Subject: FW: Several upcoming CAA Rulemaking meetings

Rob, Have you had any conversations with OSRE? If not, could you touch base with the right branch chief in OSRE to let them know about this rule and to see if they want information about it?

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Martha Segall  
Director (Acting)  
Monitoring, Assistance, and Media Programs Division  
Office of Compliance/OECA  
U.S. EPA  
ph: (202) 564-0723

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**From:** Anderson, Kate  
**Sent:** Wednesday, October 17, 2018 12:28 PM  
**To:** Segall, Martha <Segall.Martha@epa.gov>  
**Cc:** Dombrowski, John <Dombrowski.John@epa.gov>  
**Subject:** RE: Several upcoming CAA Rulemaking meetings

Would we check in with OSRE on item #4 ?

Kate Anderson  
Acting Deputy Director  
Office of Compliance  
US EPA  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460  
202-564-0278 (office)  
202-253-3140 (cell)

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**From:** Bodine, Susan  
**Sent:** Wednesday, October 17, 2018 9:30 AM  
**To:** Anderson, Kate <[Anderson.Kate@epa.gov](mailto:Anderson.Kate@epa.gov)>  
**Cc:** Starfield, Lawrence <[Starfield.Lawrence@epa.gov](mailto:Starfield.Lawrence@epa.gov)>; Traylor, Patrick <[traylor.patrick@epa.gov](mailto:traylor.patrick@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Dombrowski, John <[Dombrowski.John@epa.gov](mailto:Dombrowski.John@epa.gov)>  
**Subject:** RE: Several upcoming CAA Rulemaking meetings

Thanks, I concur with your recommendations.

Susan

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**From:** Anderson, Kate  
**Sent:** Wednesday, October 17, 2018 8:30 AM  
**To:** Bodine, Susan <[bodine.susan@epa.gov](mailto:bodine.susan@epa.gov)>  
**Cc:** Starfield, Lawrence <[Starfield.Lawrence@epa.gov](mailto:Starfield.Lawrence@epa.gov)>; Traylor, Patrick <[traylor.patrick@epa.gov](mailto:traylor.patrick@epa.gov)>; Segall, Martha <[Segall.Martha@epa.gov](mailto:Segall.Martha@epa.gov)>; Dombrowski, John <[Dombrowski.John@epa.gov](mailto:Dombrowski.John@epa.gov)>  
**Subject:** Several upcoming CAA Rulemaking meetings

Susan,

There are four upcoming CAA rulemaking meetings for which you should have received invitations. They are as follows:

[REDACTED]

3. *Major Source to Area Source (MM2A) Reclassification Proposed Rule*—OAR Request for OECA Approval of Expedited FA by Friday, October 19.

4. [REDACTED]

[REDACTED]

For **Item #3**, OAR has requested OECA approval for an expedited Final Agency Review (FAR) on the Major Source 2 Area Source (MM2A) proposed rulemaking by no later than this Friday, October 19. We have sent you information on this rule previously. **We recommend that we approve the expedited FAR with conditions.**

Currently, OAR intends to provide a FAR package for review on October 30th and convene the FAR on November 15. This time frame would allow a 10 working day review of the FAR package. In light of Patrick's recent guidance to not approve ADP process waivers until after we have received all materials, we wanted to provide for your consideration the following recommendation on the conditions under which we would agree to an expedited FAR. We have coordinated this recommendation with OCE.

**We recommend agreeing to the expedited FAR meeting scheduled for November 15** on the condition that OECA receives the complete FAR package by the promised October 30 date (providing the 10 working day review period). However, we also recommend not responding back to OAR until October 19 which would follow the Options Selection meeting rescheduled for October 18. At the Options Selection meeting, which has been delegated to Martha Segall and her staff, we would first like to determine if any OECA issues of concern come to light, particularly regarding federal enforceability. If we do not identify any concerns, we will go ahead with our approval of the expedited FAR request. If we do identify any compliance monitoring or enforceability issues during Options Selection, we will immediately bring them to your attention.

[REDACTED]

[REDACTED]

Additional Documents

[REDACTED]

[REDACTED]

[REDACTED]

- This RTR will impact approximately 43 major source MCM facilities, located mainly in the southern, eastern, and mid-western states.
- Pursuant to court order, EPA must finalize the RTR no later than June 20, 2020.

MCM Early Guidance Summary

- The risk assessment indicates that the source category risks for this rulemaking are acceptable.
- The technology review and evaluation of potential control options is ongoing.
- The 2003 NESHAP did not include standards for inorganic HAP. Although the risk is low, since chromium drives

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